

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GREAT AMERICAN INSURANCE COMPANY,

Plaintiff,

-against-

GEMSTONE PROPERTY MANAGEMENT LLC,  
DHNY APT IV LLC and LUIS MANUEL  
GARACIA SALCEDO,

Defendants.

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GEMSTONE PROPERTY MANAGEMENT LLC,  
DHNY APT IV LLC, and LUIS MANUEL  
GARCIA SALCEDO,

Third-Party Plaintiffs,

-against-

ASPEN SPECIALTY INSURANCE COMPANY,  
IRONSHORE INDEMNITY INC.,  
DISTINGUISHED PROGRAMS INSURANCE  
BROKERAGE LLC, DISTINGUISHED  
PROPERTIES UMBRELLA MANAGERS INC.,  
and THE O&S INSURANCE BROKERAGE  
GROUP, INC. *c/o its successor* HUB  
INTERNATIONAL LIMITED,

Third-Party Defendants.

Case No.: 23-cv-09100 (LJL) (GS)


**NOTICE OF MOTION  
TO COMPEL PRODUCTION**

**ORAL ARGUMENT REQUESTED**

Opposition to Great American's motion to  
compel will be due Aug. 11, 2025. Any reply  
will be due Aug. 18, 2025. The Court will  
hold a hearing on the motion on Aug. 21,  
2025 at 10 a.m. in Courtroom 15C, 500 Pearl  
Street, New York, NY 10007.

July 29, 2025

SO ORDERED.

  
LEWIS J. LIMAN  
United States District Judge

TO: Brian J. Isaac, Esq.  
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*Attorneys for Non-Party, Subin Associates, LLP*  
(via email)

All counsel of record.  
(via ECF)

**PLEASE TAKE NOTICE** that, on a date and time convenient for the Court, the undersigned counsel for Plaintiff GREAT AMERICAN INSURANCE COMPANY (“Great American”) will move before the Honorable Lewis J. Liman, United States District Judge, at the United States District Court for the Southern District of New York, located at 500 Pearl Street, Courtroom 15C, New York, NY 10007, for an order compelling Non-Party Subin Associates, LLP to produce documents in response to Great American’s January 30, 2025 document subpoena, pursuant to Federal Rule of Civil Procedure 45(d)(2)(B)(i), the Court’s March 17, 2025 written order (ECF No. 154), the Court’s May 22, 2025 oral order, and the Court’s July 22, 2025 written order (ECF Nos. 165, 167) (“Motion”).

**PLEASE TAKE FURTHER NOTICE** that, in support of its Motion, Great American will rely on the legal brief and affidavit of Mark. R. Vespole, Esq. submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that Great American requests oral argument.

Dated: July 28, 2025  
Madison, NJ

**WILSON, ELSER, MOSKOWITZ,  
EDELMAN, & DICKER, LLP**

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